



4210 East 11th Avenue  
Denver, Colorado 80220-3716  
Phone (303) 320-8333

Telefax Numbers:  
Main Building/Denver  
(303) 322-9076

Ptarmigan Place/Denver  
(303) 320-1529

First National Bank Building/Denver  
(303) 355-6559

Grand Junction Office  
(303) 248-7198

Pueblo Office  
(719) 543-8441

ROY ROMER  
Governor

JOEL KOHN  
Interim Executive Director

October 25, 1991

Mr. Frazer Lockhart  
U. S. Department of Energy  
Building 116  
P. O. Box 928  
Golden, Colorado 80402

RE: COMMENTS; PHASE I RFI/RI WORK PLAN, WEST SPRAY FIELD  
(OPERABLE UNIT NO. 11), U. S. DEPARTMENT OF ENERGY, ROCKY FLATS  
PLANT, JUNE 1990.

Dear Mr. Lockhart,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division) has reviewed the subject document submitted by DOE and prime contractor, EG&G. The document, as presented, fails to provide a framework that will ensure a comprehensive and valid investigation. A number of components, specified by the IAG Statement of Work, are either vague, inadequate or missing.

The specific objectives of the investigation are vague and need to be clarified. Characterization of source and soils is a broad RFI/RI Phase I objective of **each** Operable Unit at which RCRA closure is being conducted under the IAG. This Phase I work plan needs to focus more on the physical components of the site, identify which components are included, and provide a supporting rationale. For example, the Division understands that drilling is planned for this investigation but cannot conclude whether determination of vadose zone contamination is a specific objective.

The work plan must also disclose and reflect the broader framework within which it will be conducted. For example, the overall regulatory process governing closure of the unit must be discussed and should include a description of how this RFI/RI activity fits into DOE's internal environmental restoration program. Community relations must also be discussed as a component of this overall process as required by RCRA.

ADMIN RECORD

A-DU11-000008

The site conceptual model presented in the document should be used to assist in identifying sampling needs. There is no clear indication that the data needs of health risk assessors are being linked to the model.

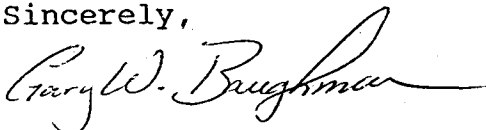
Several sections of the referenced document contain basic deficiencies that must be addressed in the revised work plan. Fortunately, the Data Quality Objectives, Remedial Alternatives, Risk Assessment, Environmental Evaluation, Field Sampling and Treatability sections of OU-7 provide generally acceptable formats and contents that may be utilized to guide revision of this work plan.

Although DOE is aware of many of the deficiencies noted above, the Division has proceeded with a review of the draft document. Our review has been undertaken to identify additional deficiencies or inadequacies that must be corrected in the final work plan. The Division's comments, and those prepared by EPA and their contractor, are attached.

Since the revised work plan will reflect major changes and should provide new insight into the proposed investigation. DOE is strongly urged to discuss the plan with CDH and EPA staff and informally submit amended work plan sections as they are developed.

If you have any questions concerning these comments, please call Harlen Ainscough of CDH at 331-4977 or Arturo Duran of EPA at 294-1080.

Sincerely,



Gary W. Baughman  
Unit Leader, Hazardous Waste Facilities  
Hazardous Materials and Waste Management Division

Attachments

cc: Daniel S. Miller, AGO  
Martin Hestmark, U. S. EPA  
Arturo Duran, U. S. EPA  
Bob Birk, DOE  
Paul Bunge, EG&G  
Randy Ogg, EG&G  
Lee Sobchack, EG&G  
Barbara Barry, RFPU